

III. AMERITECH HAS PROMOTED AND PIONEERED LOCAL EXCHANGE COMPETITION AS WELL AS IMPLEMENTED THE LOCAL EXCHANGE COMPETITION PROVISIONS OF THE TELECOMMUNICATIONS ACT OF 1996

A. Ameritech Actions Prior to the Telecommunications Act

8. In 1992, Ameritech began working with the existing CLECs to develop a plan for opening up the local exchange via switched facilities (competitive dial tone). Ameritech asked for their requirements and responded with a pioneering plan to meet all of their needs--the Ameritech Customers First Plan, which was filed with the Commission in March 1993. This plan developed unbundled offerings such as unbundled loops, pioneered methods for interconnecting competing networks on a peer-to-peer basis, and began the development process for Long Term Number Portability that eventually became the national architecture and operational plan. Ameritech actually began selling unbundled loops and interconnected CLEC switched services in 1995. The industry worked together in Illinois beginning in early 1995, through a Number Portability Workshop chaired jointly by Ameritech, AT&T and the Illinois Commerce Commission to design the Long Term Number Portability platform. Ameritech held extensive collaborative meetings with the Commission, DOJ and state regulators about the Customers First Plan--received input, modified our plans and implemented them. As a result, much of this pioneering work was incorporated into the Act itself and subsequent Commission orders.

Ameritech helped to facilitate local exchange competition, therefore, not only within our own territory, but nationally.

9. While Ameritech designed and developed a competitive local exchange entry plan with CLEC input and regulatory consultation, Ameritech also developed a new separate business unit--Ameritech Information Industry Services ("AIIS")--to serve competitors' local exchange needs. This unit was originally staffed with approximately 100 employees in 1993, and has now grown to over 1200 employees as local exchange carriers entered our market and availed themselves of Ameritech's offerings.

B. Ameritech's Actions Subsequent to the Passage of the Act

10. Ameritech did not have to start from ground zero when the Act was passed. Ameritech built upon what was already well underway. To date, Ameritech has spent over \$2 billion to further local exchange competition through:

- Increasing and enhancing the AIIS business unit staff, resources, space and service centers;

- Developing and implementing responsive electronic systems for handling CLEC pre-ordering, ordering, provisioning, maintenance and billing requirements. As a result, most CLEC orders are handled electronically today.

- Enhancing these systems to meet the most optimistic CLEC forecasts of demand with room to spare. AIIS, for example, routinely handles over 1000 orders for resale and unbundled elements each day.

-- Developing and implementing services and facilities for CLECs within Ameritech's network, such as Long Term Number Portability and a wide variety of unbundled loops.

-- Training of Ameritech and CLEC employees and providing up-to-date access, via a user friendly web site, to the latest offerings, procedures and updates.

11. Ameritech is an active, and often a leading, participant in industry standards organizations and forums dealing with interconnection issues. The company voluntarily implements industry consensus standards developed in these industry organizations.

12. Competing carriers are offering service in more than 80 percent of the communities Ameritech serves in its five states in the upper Midwest, and virtually every Ameritech community in Illinois and Michigan. Ameritech has fully implemented and made available all of the services and facilities contemplated by the provisions of Sections 251 and 271 of the Act, as summarized in the following paragraphs.

IV. Ameritech Has Fully Implemented Each Requirement of Section 251(a)

13. Ameritech believes it is fulfilling all of the duties imposed upon telecommunications carriers by Section 251(a) of TA96. Ameritech is directly or indirectly connected with the facilities of other telecommunications carriers that have requested such interconnection. In addition, Ameritech has not installed network features, functions or capabilities that do not comply with the guidelines and stan-

dards established pursuant to Sections 255 and 256. Ameritech fully supports all requirements associated with Section 255 – access to persons with disabilities. Ameritech also complies with Section 256 (Coordination for Interconnectivity) by active industry forum participation and standards organization membership. As noted earlier, Ameritech is often a leader of committees within these organizations.

V. Ameritech Has Fully Implemented Each Requirement of Section 251(b)

14. Ameritech believes it is fulfilling each of the duties imposed upon local exchange carriers ("LECs") by Section 251(b) of TA96. The following summary provides an overview of Ameritech's implementation of each item. The order and headings correspond to the headings that appear in Section 251(b).

Resale

15. Ameritech has been offering resale since prior to TA96. Ameritech currently is permitting resale of its telecommunications services on a reasonable and non-discriminatory basis in each of its five states pursuant to tariff, as required by Section 251(b)(1). It furnishes resale services to 39 carriers in its five states pursuant to interconnection or resale agreements, as required by Sections 251(c)(4), 252(d)(3) and 271(c)(2)(B)(xiv). The systems, methods and procedures by which these resold services are ordered, provisioned, billed, etc., and by which the nondiscrimination and parity requirements are satisfied are the same throughout the Ameritech region. As of May 1998, Ameritech had provisioned 635,000 lines to competitors on a resale

basis.¹ In addition, there has been a substantial amount of Centrex resale in the Ameritech region. Ameritech has established a specific business unit to focus strictly on Centrex resale. As of May 1, 1998, approximately 175,000 resold Centrex lines were in service in the Ameritech region.

Number Portability

16. Ameritech is providing interim number portability ("INP") to carriers in all five states, in accordance with the requirements prescribed by the Commission pursuant to Section 251(b)(2). INP is being provided to these carriers pursuant to their interconnection agreements, as required by Section 271(c)(2)(B)(xi), via Remote Call Forwarding ("RCF") and Direct Inward Dialing ("DID").

17. Ameritech is providing Long Term Number Portability ("LTNP") in the following major metropolitan areas: Chicago, Detroit, Cleveland, Indianapolis, Milwaukee and Columbus. All of these were converted in 1998, as required by the Commission's Number Portability Order (June 26, 1996 First Report and Order). LTNP will be available in the remainder of Ameritech's major metropolitan areas during the second half of 1998, as required by the Number Portability Order. Ameritech has also made available LTNP in other smaller cities in Michigan and Illinois, such as Springfield and Champaign, pursuant to requests from other carriers.

¹ Source: AIIIS Competitive Checklist, May 1998.

18. Ameritech is working with carriers to transition customers served via INP to LTNP. Based on agreements reached by carriers in industry number portability forums, this transition requires 120 days. Once the conversion period in a given area is complete, INP is no longer offered in that area.

19. Where INP is available, Ameritech provides the service at no charge to the carrier. Recovery of costs is subject to development of a competitively neutral cost recovery mechanism. For LTNP, the Commission has developed a cost recovery mechanism that is due to be implemented in February 1999.²

20. As of July 1, 1998, Ameritech has ported approximately 2,700 numbers in the five states using LTNP and 108,000 using INP.

Local Dialing Parity

21. Ameritech has been and currently is furnishing local dialing parity (through interconnection, number portability and nondiscriminatory access to phone numbers) on all of its switches and access lines, and to carriers that have interconnection agreements, in its five states. Thus, Ameritech is meeting the requirements of Sections 251(b)(3) and 271(c)(2)(B)(xii). More than 1.125 billion minutes of local inter-network calls were completed during April 1998 with full local dialing parity.

² Third Report and Order in the Matter of Telephone Number Portability, Released 5-12-98, Docket 98-82.

**Telephone Numbers, Operator Services, Directory Assistance and
Directory Listings**

22. Ameritech is furnishing to carriers in each of its five states non-discriminatory access to telephone numbers, directory assistance, operator services and directory listings pursuant to their interconnection agreements or tariff, as required by Section 251(b)(3). Ameritech's procedures for furnishing services are established and implemented on a region-wide basis, and ensure that the services are provided at parity, as required by Section 271(c)(2)(B)(vii). As of May 31, 1998, 477 directory assistance trunks and 197 operator services trunks from switches of competing carriers were in service in the five states.

23. Ameritech currently is furnishing listings in its white pages directories to carriers in every Ameritech state pursuant to their interconnection agreements. To date, a total of 42 carriers operating in all of the five states have provided listings to Ameritech for inclusion in its white pages directories. Ameritech's white pages directory policies are implemented on a region-wide basis and both the Michigan PUC and Ameritech's competitors have stated that Ameritech appears to provide these services at parity.

24. Although it is in the process of relinquishing the responsibility, Ameritech is still the Central Office Code Administrator in each of its in-region states. In that capacity, it furnishes nondiscriminatory access to telephone numbers for assignment to the networks of competing carriers, in accordance with the Central

Office Code Assignment Guidelines and the NPA Code Relief Planning Guidelines, under the oversight and complaint jurisdiction of each state's PUC and the Commission. Ameritech has furnished, and under its interconnection agreements continues to furnish, telephone numbers to competing carriers in compliance with Section 271(c)(2)(B)(ix).

25. As of June 1, 1998, Ameritech had assigned 1157 central office codes (typically the first three digits of a telephone number, referred to as an NXX) at no cost to competing local exchange carriers in its five states. Each NXX code can serve about 10,000 telephone numbers; thus, over 11 million numbers now are available to CLECs. This listing does not include any of the 635,000 lines taken and resold by competitors (see paragraph 15 above).

Access to Rights-Of-Way

26. Ameritech currently is making available to all competitors throughout all five states nondiscriminatory access to poles, ducts, conduits and rights-of-way, as required by Section 251(b)(4). The access available to these carriers is at rates that conform to the requirements of Section 224 and Section 271(c)(2)(B)(iii) on the terms and conditions approved by the telephone regulatory agency ("PUC") in each state. The procedures and methods by which Ameritech provides such access and ensures nondiscrimination and parity are employed on a region-wide basis, and were reviewed by the Commission and conceded by CLECs to conform to the requirements of Section 271. This remains true. To date, Ameritech has furnished compet-

ing carriers with access to approximately 748,229 feet of conduits and ducts and 211,907 poles in Michigan, 1,370,233 feet and 286,428 poles in Ohio, 103,916 feet and 117,664 poles in Indiana, 763,373 feet and 478,093 poles in Illinois, and 25,926 feet and 78,368 poles in Wisconsin.

Reciprocal Compensation

27. Ameritech has established arrangements, through tariffs and interconnection agreements, to pay reciprocal compensation for local traffic in each state as required by Section 251(b)(5). Pursuant to these arrangements, Ameritech currently furnishes reciprocal compensation for the exchange of local traffic to dozens of carriers, including both CLECs and CMRS providers, in each in-region state, as required by Section 271(c)(2)(B)(xiii). The tariff rates were approved by the relevant state PUCs. The rates provided for in many of these interconnection agreements were the product of private negotiations between the parties, while the rates provided for in the remainder were arbitrated. In the case of arbitrated agreements, reciprocal compensation was paid through a true-up after the agreement was finally approved. A substantial amount of local traffic is being exchanged on an ongoing basis between Ameritech, on the one hand, and competing carriers, on the other. In fact, in April 1998, Ameritech handled 1.125 billion minutes of incoming and outgoing traffic subject to reciprocal compensation.

28. There is one major open issue with regard to reciprocal compensation. Ameritech, like many LECs, is in a dispute with certain CLECs who claim that

Internet Service Provider ("ISP") traffic is local traffic on which reciprocal compensation must be paid pursuant to TA96, the Commission's implementing regulations or Ameritech's approved interconnection agreements. This issue is presently before various state PUCs and state and federal courts in proceedings to which Ameritech is a party. In addition, the issue is pending before the Commission in CCB/CPD 97-30.

VI. Ameritech Has Fully Implemented Each Requirement of Section 251(c)

29. Ameritech believes it is also fulfilling each of the duties imposed upon incumbent LECs ("ILECs") by Section 251(c) of TA96. The following summary provides an overview of Ameritech's implementation of each item. The order and headings correspond to the headings that appear in Section 251(c).

Duty to Negotiate

30. In each of the five states, Ameritech has negotiated in good faith with any telecommunications carrier requesting negotiation of an interconnection agreement, as required by Section 251(c)(1). Such requesting carriers have included competing local exchange carriers ("CLECs"), resellers, CMRS providers and others. As a result of these negotiations, or arbitrations resulting therefrom, there are now 175 interconnection agreements in effect in the Ameritech states. Each of these agreements has been approved by the relevant state PUC, either as a voluntarily negotiated agreement under Section 252(e)(1) or as a result of an arbitration proceeding pursuant to Section 252(b)-(e).

Interconnection

31. In each of the five states, Ameritech is providing interconnection to any requesting telecommunications carrier (i) at any technically feasible point, (ii) at parity with the interconnection Ameritech provides to itself and its affiliates, (iii) on a nondiscriminatory basis and (iv) on rates terms and conditions that are just, reasonable and nondiscriminatory, as required by Section 251(c)(2). Such interconnection is being provided pursuant to tariff and interconnection agreements in each state. Each of these agreements has been approved by the relevant state PUC, either as a voluntarily negotiated agreement under Section 252(e)(1) or as a result of an arbitration proceeding pursuant to Section 252(b)-(e).

32. Carriers can avail themselves of interconnection at any technically feasible point on Ameritech's network to exchange traffic, access call-related databases and access unbundled network elements. These available interconnection points include the line and trunk sides of the local switch, the central office cross connect points, out-of-band signaling transfer points and the trunk interconnect points on the tandem switch. As of June 22, 1998, about 182,491 interconnection trunks of competing carriers were in service in Ameritech's five-state territory.

33. The improvement in the trunk blocking rate has continued from May 1997 to the present. After consultation with Commission staff, Ameritech has taken a number of actions that have fueled this improvement. Specifically:

- Ameritech has increased the number of interconnection trunks by 248% (from 52,364 to 182,491), augmenting them at a rate faster than the growth of traffic exchanged with competitors over such trunks.
- Ameritech has developed and uses a call completion report that measures whether trunk group blockage and call blockage is at parity.
- The call completion report reflects the actual level of traffic being successfully completed, and thereby reflects trunk group size and successful rerouting of traffic.
- Pursuant to its interconnection agreements, Ameritech's recommended network interconnection and architectural practices are at parity with how Ameritech interconnects its own offices, and have been adopted by all CLECs.
- TCG's complaints have been resolved and interconnection is being provided to it at parity.
- Ameritech provides peg count and overflow data to CLECs that enables them to identify and correct trunk group blockage problems.

Unbundled Access

34. In each of the five states, Ameritech is providing, to any requesting telecommunications carrier, unbundled access to network elements for the provision of a telecommunications service, as required by Section 251(c)(3). This access is being provided (i) at any technically feasible point, (ii) on rates, terms and conditions that are just, reasonable and nondiscriminatory and (iii) in a manner that allows requesting carriers to combine elements in order to provide a telecommunications service. The access is being provided pursuant to tariff and interconnection agreements in each state.

35. Ameritech provides access to network elements located within wire centers on a physical collocation basis. Other forms of access to network elements can be accommodated if the elements are located outside of the wire center. Each of these access arrangements, as well as any other technically feasible wire center arrangements, are reviewed on an individual case basis, if requested by a CLEC.

Resale

36. Ameritech currently is offering its telecommunications services for resale at wholesale rates by both telecommunications carriers and non-telecommunications carriers (see paragraph 15 above). Ameritech does not prohibit, or impose unreasonable or discriminatory conditions or limitations on, the resale of such services. Carriers are free to resell those services to other carriers. Therefore, Ameritech believes it is in compliance with Section 251(c)(4).

Notice of Changes

37. In its Second Report and Order (Docket 96-98), the Commission adopted rules requiring ILECs to provide public notice regarding any network change that:

(1) will affect a competing service provider's performance or ability to provide service; or

(2) will affect the ILEC's interoperability with other service providers.

38. Carriers must include in their public notices, at a minimum, (1) the carrier's name and address, (2) the name and telephone number of a contact person,

(3) the implementation date of the planned changes, (4) the location(s) at which the changes will occur, (5) a description of the type of changes planned, and (6) a description of the reasonably foreseeable impact of the planned changes. The Commission identified two means by which a carrier could fulfill its public notice obligation: (1) by filing a public notice with the Commission or (2) through industry fora, industry publications, or the carrier's publicly accessible Internet site.

Ameritech has reviewed these rules internally with business unit and network personnel and has adopted procedures to file network change public notices directly with the Commission pursuant to filing requirements outlined in Section 51.329 (c).

39. As a result of Ameritech's ongoing filing of such public notices, it believes it is in full compliance with Section 251(c)(5).

Collocation

40. Ameritech is providing collocation consistent with Section 251(c)(6). Ameritech provides physical and virtual collocation to competitors in each state, under approved interconnection agreements and tariffs. Ameritech makes collocation available on terms and conditions and at rates established in the relevant agreements and also pursuant to tariff.

41. As of May 1, 1998, competing carriers were physically collocated in 113 and virtually collocated in 166 Ameritech wire centers, with 21 more wire centers scheduled for physical and 56 more scheduled for virtual activation in the third quarter of 1998. By collocating in those 263 offices, CLECs have the ability to

access 11 million access lines, including 4.8 million business lines. This is 63 percent of the business lines in the Ameritech-served region.

42. While there have been some disputes over the specifics of certain collocation arrangements, these have been resolved and Ameritech is in compliance with Section 251(c)(6).

Ameritech Provides Interconnection To Facilities-based CLECs

43. Ameritech has negotiated in good faith and entered into interconnection agreements with facilities-based CLECs in each of the five states, as required by Sections 251(c)(1) and 271(c)(1)(A). Each of these agreements has been approved by the relevant state PUC, either as a voluntarily negotiated agreement under Section 252(e)(1) or as a result of an arbitration proceeding pursuant to Section 252(b)-(e).

44. In each state, competitors are providing local exchange and exchange access to business customers, residential customers, or both, either exclusively over their own telephone exchange service facilities or predominantly over their own telephone exchange service facilities in combination with the resale of the telecommunications services of another carrier. There are at least 11 such facilities-based CLECs competing with Ameritech in Michigan, eight in Ohio, 14 in Illinois, six in Indiana and five in Wisconsin.

VII. Ameritech Has Fully Implemented Each Item of the Section 271 Competitive Checklist.

45. Ameritech believes it is providing products and services, prices, operational systems and performance benchmarks that implement each item of the Section 271 competitive checklist. The following summary provides an overview of Ameritech's implementation of those items not already addressed in the discussion above regarding Section 251. The order corresponds to the headings that appear in Section 271(c)(2)(B).

46. Information about the steps Ameritech has taken to ensure the quality of the access and interconnection it provides is contained in ¶¶ 31-36 above. Based on this evidence, Ameritech believes it is now providing its competitors with interconnection at parity.

47. Numerous competitors in every Ameritech state have available to them under their interconnection agreements non-discriminatory access to (i) all of the network elements that the Commission has required to be unbundled,³ on terms and conditions and at rates consistent with Sections 251(c)(3), 252(d)(1) and 271(c)(2)(B)(ii), (iv-viii) and (x), (ii) standard combinations of elements required to be available by applicable state and federal law, and (iii) sub-element unbundling, to

³ In the Matter of the Local Competition Provisions in the Telecommunications Act of 1996, CC Docket No. 96-98 (rel. August 8, 1996).

the extent technically feasible, pursuant to Bona Fide Request ("BFR"). With the exception of local switching, which is available in every state but not yet taken by any competitor, Ameritech is providing all the core unbundled network elements to one or more competitors in each state.

48. Ameritech currently is furnishing unbundled local loops to 15 carriers throughout its region, and carriers in four of the five states are using the loops to provide local service. These carriers have available to them at least eleven different loop types – four varieties of 2-wire analog loops, a 4-wire analog loop, and six varieties of digital loops – on the terms and conditions and at the rates provided for in PUC-approved interconnection agreements or tariffs. Currently, approximately 94,600 unbundled local loops have been leased by competitors from Ameritech and 63,826 of these are already in service in the five states. The systems, methods and procedures by which the nondiscrimination and parity requirements for unbundled loops are satisfied have been implemented on a region-wide basis and Ameritech is confident that they fulfill the requirements of Section 271(c)(2)(B)(iv).

49. Ameritech currently has interconnection agreements providing for unbundled local transport in all five states. CLECs have purchased unbundled local transport in four of the five states under the terms of their interconnection agreements and pursuant to Section 271(c)(2)(B)(v). In addition, competitors such as MFS, TCG, and Consolidated Communications, Inc. ("CCI") are taking this service under access tariffs. Local transport, in the form of both dedicated and shared inter-office

transmission facilities, as defined by the Eighth Circuit, is available to these carriers under their interconnection agreements.

50. Local and tandem switching as defined by the Commission (see 47 C.F.R. § 51.319(C)(1) and (2)), currently are being offered by Ameritech in all five states. Therefore, Ameritech believes it is providing this item as required by Section 271(c)(2)(B)(vi). To date, no carrier has yet ordered unbundled local or tandem switching from Ameritech.

51. Ameritech currently is furnishing numerous carriers in each of the five states with access to 911 and E911 service pursuant to their interconnection agreements. Carriers also may obtain these services pursuant to tariffs in the states of Michigan and Wisconsin. As of June 1, 1998 there were 438 911 trunks in service for competing carriers in the five Ameritech states.

52. Ameritech has taken steps to rectify certain problems identified in the 1997 Michigan 271 proceeding by competitors, and it has improved the accuracy of its 911 databases, as requested by the Commission. Ameritech is confident that these services are provided today at parity with the service Ameritech provides to itself.

53. In addition, Ameritech is furnishing directory assistance and operator service to carriers in every state pursuant to their interconnection agreements or pursuant to tariff. Its procedures for furnishing services are established and implemented on a region-wide basis, and ensure that the services are provided at parity.

54. Ameritech currently is furnishing white page listings to carriers in every state pursuant to their interconnection agreements and as required by Section 271(c)(2)(B)(viii)(see ¶ 23 above). Ameritech's white pages directory policies are implemented on a region-wide basis and both the Michigan PUC and Ameritech's competitors have stated that Ameritech appears to meet this checklist item.

55. Ameritech has furnished, and under its interconnection agreements continues to furnish, telephone numbers to competing carriers in compliance with Section 271(c)(2)(B)(ix)(see ¶¶ 24-25 above).

56. Ameritech currently is furnishing access to its signaling and call-related databases to numerous competitors in every state pursuant to their interconnection agreements. Each competitor also has available to it access to signaling networks, call-related databases, and service management systems. The systems, methods and procedures by which such access is provided, and by which the nondiscrimination and parity requirements are satisfied, have been implemented on a region-wide basis. Currently, dozens of competitors, including interexchange carriers, independent telephone companies, cellular carriers and others are interconnected to Ameritech for purposes of access to call-related databases and signaling.

57. Ameritech has been and currently is furnishing local dialing parity (through interconnection, number portability and nondiscriminatory access to phone numbers) on all of its switches and access lines, and to all carriers that have intercon-

nection agreements, in its five states. Thus, Ameritech believes it is meeting the requirements of Section 271(c)(2)(B)(xii). Millions of minutes of local inter-network calls have been completed in 1998 with full local dialing parity.

58. Ameritech currently is furnishing access to its operations support systems ("OSS") to over 50 carriers in its five states pursuant to interconnection or resale agreements. These OSS perform five functions: pre-ordering, ordering, provisioning, maintenance and repair, and billing. The systems, methods, procedures and electronic interfaces by which these five services are performed and by which the nondiscrimination and parity requirements of Sections 251 and 271 are satisfied are the same throughout the Ameritech region. These resale and UNE customers have used Ameritech's OSS in transacting business, which has resulted in over 635,000 resale lines and 94,600 unbundled loops sold.

59. Ameritech believes it has resolved OSS issues previously identified by the Commission. The primary improvements have come as a result of three factors: (1) increased use of electronic interfaces by both Ameritech and competing carriers; (2) additional carrier experience with use of OSS access services provided by Ameritech; and (3) new documentation, via a Web site, of procedures for ordering and using OSS. I and others from Ameritech have had extensive discussions with the Commission staff about these improvements and the current status of OSS capabilities as part of the Section 271 collaborative meetings held this year. Similar

discussions have been held with state commissions and the DOJ in the same timeframe.

60. Ameritech now offers a fully operational electronic method of pre-ordering, ordering, provisioning, maintaining and billing for resale and all network elements (with the exception of unbundled tandem switching, which no CLEC has yet ordered). Over 750,000 electronic orders have been placed by CLECs with Ameritech. The interfaces have improved dramatically since the Michigan 271 Order was released in August 1997. Many of these improvements are reflected in the performance measurements developed during the last year. Ameritech has worked with each CLEC to convert from manual to electronic systems. As a result, the larger CLECs have converted or are in the process of testing their systems with Ameritech. Efficiencies are gained by both companies once the electronic conversions are implemented.

61. Use of Ameritech's electronic interfaces is growing. In May 1998, faxed orders constituted only 37 percent of CLEC OSS transactions, while almost two-thirds -- 63 percent -- were placed electronically. This has translated into substantial improvements in performance since May 1997. For example, the average due date selection time in 1998 has been 7.9 seconds, retrieval of customer service record data occurs in less than 20 seconds, the average installation interval for business services is 2.2 days, and the business due dates are met 97.4 percent of

the time. It is clear that the electronic interfaces are much more efficient and accurate than manual systems, especially for ordering.

62. To further assist CLECs, Ameritech has developed a Web site -- "TC.Net" -- that provides an easy to use and extensive search capability for ordering and OSS procedures. This new web site has been made available to all active carriers and the Commission.

63. Ameritech now provides competing facilities-based CLECs and resale competitors with electronic access to its OSS that is in every way the equal of the access it provides to itself. Use of these interfaces gives the CLECS all the tools that Ameritech retail representatives have at their disposal and is producing the kind of results that have enabled the expansion of the CLECS business described above. Therefore, Ameritech is confident that these services are provided today at parity, as required by Sections 251 and 271.

64. As a means of improving its quality service and demonstrating parity of performance between services provided to carriers and services provided to retail customers (to ourselves), Ameritech has developed an extensive array of performance measurements to supplement state measures. These are discussed in the affidavit of Wharton B. Rivers. In addition, Ameritech has provided extensive comments to the Commission in conjunction with the Notice of Proposed Rulemaking on Performance Measurements. There are approximately 100 different measurements that Ameritech believes are relevant to demonstrating both perfor-

mance quality and parity. These measurements cover the following categories of service:

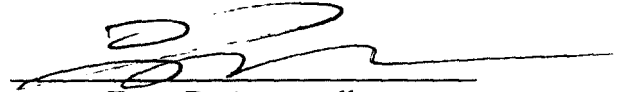
- Pre-ordering and ordering processes and cycle time
- Reliability and availability of OSSs
- Resale performance
- Unbundled Network Element performance

65. Ameritech tracks its performance in each category on an individual carrier basis and makes industry average data, as applicable, available to each carrier in written reports that are discussed at service management meetings held on a regular basis. Parity comparisons with retail equivalents, where appropriate, are also provided to carriers.

Ameritech is Ahead of the Commission's Implementation Schedule for IntraLATA Toll Dialing Parity

66. Although not part of the competitive checklist, intraLATA toll dialing parity ("2PIC") is required by Section 271(e)(2). Ameritech has fully implemented intrastate intraLATA toll dialing parity in Illinois and Wisconsin. Implementation is complete in 70 percent of Ameritech's Michigan territory, with the remaining 30 percent to be completed ten days prior to February 8, 1999 (or earlier if Ameritech begins offering in-region interLATA services in Michigan). Ameritech is also on track to meet the February 8, 1999 deadline for LTNP implementation in Indiana and Ohio.

I declare under penalty of perjury that the foregoing statements are true and correct.

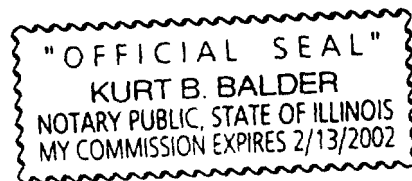

Terry D. Appenzeller

Sworn and subscribed before me

this 21st of July, 1998



NOTARY PUBLIC



My Commission Expires: 2/13/02

Pursuant to 47 C.F.R. §§ 1.743(c), 1.913(c), 5.54(c), the preceding document is a copy of the original signed affidavit, which was filed as an attachment to Exhibit 2 to the Form 490 applying for the Commission's consent to transfer control of Part 22 licenses held by Detroit SMSA Limited Partnership from Ameritech Corporation to SBC Communications Inc. That Form 490 was filed concurrently with this application.